



Nutriceutical Innovations

Nutriceutical Innovations, Inc.

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P.O. Box 906

Bedford, VA 24523

Phone: 540-587-0900

June 13, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Pkwy.,
College Park, MD 20740

JUN 17

Office of Nutritional Products,

I am writing on behalf of Nutriceutical Innovations Inc. (hereafter "N.I.") to provide notice to the FDA, pursuant to 21 USC 343 and 21 CFR 101.93, concerning the labeling of N.I.'s RetroCel product. I am attaching to this letter, an original and two copies of the RetroCel label. Please accept the information below on behalf of N.I. in accordance with the above cited provisions.

Manufacturer Name: Nutriceutical Innovations, Inc.
3085 Moneta Road
Bedford, VA 24523
(540) 587-0900

Text of the statement being made Under the Federal Food, Drug, and Cosmetic Act § 403(r) (6): "Anti-Aging"

Name of Dietary Supplement: RetroCel

Disclaimer on Label: "These Statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat and cure or prevent disease."

The undersigned certifies that the information contained in the notice is complete and accurate and that Nutriceutical Innovations Inc has substantiation that the statement is truthful and not misleading.

Thank you for your attention to this matter. Should the FDA have any questions or need any further information concerning this matter, please feel free to contact me at the address or phone number above.

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ENCLOSURES

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Sincerely,
Kenneth H. Cutler
Kenneth H. Cutler
President

2005-3956
(AFMS)

Supplement Facts Continued...		
	Amount/Serving	%DV
Copper (as copper gluconate)	2 mg	100%
Manganese (as manganese gluconate)	5 mg	250%
Chromium (as chromium amino acid chelate)	120 mcg	100%
Trans-resveratrol	20 mg	*
Lutein	6 mg	*
Lycopene	6 mg	*
Zeaxanthin	1 mg	*
Alpha-lipoic acid	100 mg	*
Acetyl-L-carnitine HCl	500 mg	*
N-Acetyl-L-cysteine	100 mg	*
Hyaluronan (solubilized hyaluronic acid)	10 mg	*
Antioxidant Blend	250 mg	*
Green tea leaf extract (98% polyphenols), turmeric root, pine bark extract, quercetin dihydrate, grape skin extract (37% polyphenols), bilberry fruit extract, and grape seed extract (95% polyphenols)		
* Daily value (DV) not established		
Other ingredients: Microcrystalline cellulose, hypromellose, stearic acid, vegetable stearin, hydroxypropyl cellulose, magnesium stearate, silica and spirulina		
**These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent disease.		



Nutraceutical Innovations™



RetroCel
Time Release / Anti-Aging**

Dietary Supplement • 60 Tablets

Supplement Facts		
Serving Size 2 Tablets / Servings per Container 30		
	Amount/Serving	%DV
Vitamin A (as retinyl palmitate and 25% as beta-carotene with natural mixed carotenoids)	5,000 IU	100%
Vitamin C (as ascorbic acid)	250 mg	417%
Vitamin D (as cholecalciferol)	400 IU	100%
Vitamin E (as d-alpha-tocopheryl succinate)	200 IU	667%
Thiamin (as thiamin mononitrate)	25 mg	1,667%
Riboflavin	25 mg	1,471%
Niacin (as niacinamide)	25 mg	125%
Vitamin B6 (as pyridoxine HCl)	25 mg	1,250%
Folate (as folic acid)	400 mcg	100%
Vitamin B12 (as cyanocobalamin)	25 mcg	417%
Biotin	25 mcg	8%
Pantothenic acid (as D-calcium pantothenate)	25 mg	250%
Calcium (as calcium carbonate)	200 mg	20%
Iodine (as potassium iodide)	150 mcg	100%
Magnesium (as magnesium oxide)	100 mg	25%
Zinc (as zinc oxide)	25 mg	167%
Selenium (as selenium amino acid chelate)	200 mcg	286%
Directions: As a dietary supplement, take 2 tablets daily with a meal or as directed by a physician.		
Distributed by: Nutraceutical Innovations, Inc. Bedford, VA 24523 • www.NI Supplements.com 1-866-829-1618 • A2920601		